



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS/RMP  
F. #2021R00600

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December 17, 2024

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By Email and ECF

Re: United States v. Sun, et. al.  
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

Bates No.	Description of Item
EDNY_037896-EDNY_037907	Notes and Attachments Associated with the Report Documenting Linda Sun's July 15, 2020 Interview with the F.B.I. (See EDNY_016469)
EDNY_037908-EDNY_037915	Notes Associated with the Report Documenting the Interview of Linda Sun and

<b>Bates No.</b>	<b>Description of Item</b>
	Chris Hu During the Search of the Sun and Hu Residence (See EDNY_011923)
EDNY_037916-EDNY_037919	Arrest Record for Linda Sun
EDNY_037920-EDNY_037920	Report Documenting a FARA Filing Check for Linda Sun
EDNY_037921-EDNY_037922	Arrest Record for Chris Hu
EDNY_037923-EDNY_038020	F.B.I. Surveillance Records
EDNY_038021-EDNY_038036	U.S. Customs and Border Protection Person Encounter Lists for Linda Sun and Chris Hu
EDNY_038037-EDNY_038042	Business Agreement and Associated Translation
EDNY_038043-EDNY_038933	Draft Summary Translations of Chat Messages
EDNY_038934-EDNY_042363	Responsive Report for Apple Account chrishu212@gmail.com
EDNY_042364-EDNY_043484	Responsive Report for Apple Account lsun0415@icloud.com
EDNY_043485-EDNY_043538	Records from Apple
EDNY_043539-EDNY_044303	Records from AT&T
EDNY_044304-EDNY_045666	Records from Google
EDNY_045667-EDNY_045669	Records from LinkedIn
EDNY_045670-EDNY_045697	Records from Twitter
EDNY_045698-EDNY_045738	Records from Ultra Mobile (T-Mobile)
EDNY_045739-EDNY_046092	Records from Verizon
EDNY_046093-EDNY_046146	Records from Ferrari
EDNY_046147-EDNY_046196	Records from Land Rover

Bates No.	Description of Item
EDNY_046197-EDNY_046255	Records from Mercedes

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Alexander A. Solomon  
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cc: Clerk of the Court (BMC) (by ECF) (without download link)